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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:  
  
ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED**

**[PROPOSED] ORDER**

The Court has considered Facebook, Inc.'s ("Facebook") Statement in Support of Plaintiffs' Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed (Dkt. 1070), which proposes to redact limited portions of the following documents:

<b>Document</b>	<b>Dkt. No.</b>	<b>Description of Portions Sought to Be Kept Under Seal</b>
Miller Dep. Tr.	1070-8	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary video technology, data systems, and data storage and processing practices. Miller Dep. Tr. at 115:1-116:9, 116:19-117:7, 117:9-22.</li> </ul>
Fahey Dep. Tr.	1070-9	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary video technology, data systems, and data storage and processing practices. Fahey Dep. Tr. at 28:25-30:1, 82:9-13, 16-21.</li> </ul>
Plaintiffs' Ex. 105 (Cross Dep. Trs.)	1070-3-7	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 105 at 169:7-8, 18, 170:17-18, 25, 171:3-5, 15-16, 18-19, 172:2, 6-7, 173:7, 10, 679:16-17, 19-25, 680:1-5, 7-9, 13, 20-22, 681:8-9, 13-16, 19-20, 22-23, 682:17-19, 684:4-8, 697:9-10, 15-17, 19-21, 25, 698:2, 13, 699:22-24, 757:16, 18-20, 22-25, 758:2-3, 5-9, 16-18, 20-21, 23-25, 759:1-2, 12, 25, 760:3-4, 8, 12-13, 16-18, 21, 25, 761:12, 762:7, 9-15, 17-20, 22-24, 763:23-24, 764:1-3, 8-10, 12-13, 15-23, 765:1, 4, 6-9, 13, 766:2, 8, 13-15, 17-20, 22, 767:2-6, 14, 18-19, 22-25, 768:1-3, 5-6, 8-11, 13-14, 16-17, 19-21, 23-25, 769:1-2, 4, 13-15, 18-20, 22-25, 770:1-3, 5-7, 11, 13-15, 18-24, 771:8-13, 23-25, 772:1, 3-4, 7-9, 11-13, 17, 20, 23, 25, 773:3, 7, 10, 12, 17-21, 23-25, 774:6-7, 10-11, 14-15, 775:3-4, 14-16, 20-23, 25, 776:2, 6-12, 17-19, 22-23, 781:20-21, 782:10-11, 783:19, 786:1, 4-8, 10-12, 13-17, 19-22, 787:2-3, 791:4-7, 16-21, 818:1-2, 7-9, 13, 15-16, 18-19, 21-22, 24-25, 855:3-4, 856:2, 10-11, 19, 22-23, 857:16-18, 858:1-3, 7-8, 11-12, 18-21, 859:4-5, 8-10, 16-17, 860:2-3, 23, 861:14-19, 862:5-8, 11-15, 19, 863:3, 5-6, 25, 864:1-5, 9-13, 865:13-16, 866:4, 15-16, 21-23, 869:22-24, 870:8-9, 21, 871:6, 11, 18, 20-23, 25, 872:3-4, 8, 10, 14, 16, 22-24, 875:22-25, 876:1-4, 6-9, 12, 15-18, 877:24-25, 878:3-8, 885:23-24, 886:5-6, 887:4-7, 11-14, 20, 22-23, 25, 888:1, 3-7, 13-14, 22-24, 897:16-19, 22-25, 898:4-6, 899:8-10, 901:14-17, 24-25, 902:8-12, 24-25, 903:1-4, 12-16, 907:20-22, 908:2-4, 916:13-16, 19-20, 22, 24, 917:1, 4, 5-6, 9-12, 14-17, 20-21, 25, 918:1-2, 4-7, 9-10, 919:12-14, 16-22, 920:4-6, 8-9, 921:21, 24, 922:4, 6-8, 13-14, 16, 19, 21-24, 923:1-4, 9-14, 924:1-3, 5-6, 8-9, 11-17, 19-23, 925:4-7, 9-16, 18-21, 23-25, 927:1, 4, 6-11, 15, 17, 23, 928:3-5, 10-12, 18, 21-23, 25, 929:10, 13, 17-19, 22-23, 930:1, 5, 8-9,</li> </ul>

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- Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. *Id.* at 62:16-17, 19-22, 25, 63:1-2, 93:16, 18, 94:11, 19, 21, 95:8, 11-12, 17, 19, 96:5, 10, 20, 100:8-9, 126:8-12, 130:11, 14, 131:4, 7, 132:6-8, 12, 16-17, 19-20, 24, 237:21-24, 238:18, 252:15-16, 253:6-7, 266:11-13, 18-20, 268:2-3, 20-23, 269:2-6, 270:1-2, 273:5-8, 14-15, 274:22, 275:12, 277:11-17, 281:25, 282:1-6, 302:3, 303:8-9, 312:9, 314:19-20, 315:3-4, 13-14, 25, 318:4, 319:21-22, 322:10, 338:7-11, 18, 25, 339:1-2, 10-12, 344:20-21, 358:8-10, 360:16, 369:7-8, 22-23, 550:13, 561:9-10, 15-16, 563:24-25, 583:10, 584:18, 23, 586:24, 587:8, 588:22-23, 589:1, 604:17-21, 605:7-10, 23, 606:14-15, 18, 610:1, 660:16-19, 663:9-10, 14-17, 20-24, 664:11, 19-20, 23-25, 665:1-2, 5, 19, 666:11, 17, 21, 667:2-3, 10-11, 673:5-6, 685:11-14, 688:11-12, 15, 18, 709:11-12, 711:11, 16-18, 712:2-3, 5-6, 8, 12, 896:2-4, 6-11, 13, 914:10-15, 1000:7-8, 10-11, 14, 1040:3, 8-10, 12-13, 16-18, 20, 1041:2, 6, 16, 18-21, 24-25, 1042:1, 3, 7-8, 10, 12, 17, 21-24, 1081:1-4, 6-7, 11, 14-15, 21-23, 1086: 4, 7-9, 13-14, 18, 23-25, 1148:7, 1190:13, 18, 1191:1, 21-22, 25, 1192:1, 6, 10, 15-16, 20, 1193:3, 5, 10, 19.
- Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. *Id.* at 76:4-7, 78:5-7, 10-12, 14-15, 17-19, 22, 79:1, 3, 80:12-13, 81:20-21, 24-25, 82:1, 116:18, 117:4-6, 10-12, 20, 24-25, 120:18, 226:11-12, 296:13-14, 19, 297:2, 12, 573:9-10, 12, 14-16, 576:18-19, 21, 579:17-18, 608:19-20, 609:18, 25, 611:1-3, 6-8, 10, 12-15, 19-20, 25, 612:1, 616:18-19, 21-22, 617:9-10, 15-20, 618:3, 619:6-7, 12, 14, 620:20, 621:3-4, 7-9, 11-13, 18, 622:11-15, 623:11-13, 20-22, 629:13, 15, 637:14-16, 21-25, 638:4-5, 7-8, 10-11, 639:22-23, 640:2-4, 7-8, 642:15-17, 21-23, 643:5-7, 10, 12-13, 644:2, 11-12, 645:4-5, 14-15, 17, 646:16-18, 648:4-5, 16-17, 649:13-14, 25, 650:1-3, 8-9, 19-22, 654:10-11, 23-24, 656:10-11, 19-21, 657:3-4, 658:17-18, 798:15-17, 19-21, 801:7-13, 15, 18-20, 21-22, 24-25, 802:1-2, 5-9, 13-16, 18, 24-25, 803:1-2, 5-6, 8-9, 13-16, 19, 804:1-5, 8-10, 14-15, 19, 22-25, 805:2-4, 6-14, 18, 23, 806:1-3, 18-20, 807:6-7, 11-12, 23, 808:2-3, 11, 14-16, 20-21, 809:6-10, 17-20, 811:5-8, 11-12, 14-15, 812:1-4, 7, 15-21, 23, 25, 813:1-3, 5-

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Good cause having been shown, Plaintiffs' Administrative Motion To Consider Whether Another Party's Materials Should Be Sealed is GRANTED. The Court hereby ORDERS:

1. The redacted versions of the following documents shall be filed on the public docket:
  - A. The deposition transcript of David Miller, attached as Exhibit 1-B to the Stein Declaration.
  - B. The deposition transcript of Michael Fahey, attached as Exhibit 2-B to the Stein Declaration.
  - C. The combined deposition transcript of Simon Cross, attached as Exhibit 105-B to the Stein Declaration.
2. The unredacted versions of the following documents shall be sealed permanently:
  - A. The deposition transcript of David Miller, attached as Exhibit 1-A to the Stein Declaration.
  - B. The deposition transcript of Michael Fahey, attached as Exhibit 2-A to the Stein Declaration.
  - C. The combined deposition transcript of Simon Cross, attached as Exhibit 105-A to the Stein Declaration.

1 **IT IS SO ORDERED.**

2  
3 DATE: \_\_\_\_\_

\_\_\_\_\_  
4 VINCE CHHABRIA  
United States District Judge